

**United States District Court
District of South Carolina**

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Miyuki Maureen Johnson, as Trustee
MMJ Foreign Express Trust and DK Johnson Estate Trust

Plaintiff,

C/A No.: 3:25-cv-06160-JFA-SVH

v.

Freedom Mortgage Corporation,
LoanDepot.com, LLC,
Brock & Scott, PLLC

Defendants.

Verified Complaint for Damages, Injunctive Relief, and Trust Enforcement

NOW COMES Plaintiff, Miyuki Maureen Johnson, Trustee of the above-named trusts, and alleges the following:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction under 28 U.S.C. §1331 (federal question), §1343 (civil rights), and supplemental jurisdiction over related state claims.
2. Venue is proper in this district pursuant to 28 U.S.C. §1391(b) as the events occurred in South Carolina and Florida.

II. PARTIES

3. Plaintiff is the authorized Successor Trustee of the MMJ Foreign Express Trust and DK Johnson Estate Trust, with standing to bring this action.
4. Defendant Freedom Mortgage Corporation is a mortgage servicing entity involved in foreclosure proceedings after receiving lawful discharge documents.
5. Defendant LoanDepot.com, LLC is a mortgage lender who refused lawful presentments and trust discharge authority.
6. Defendant Brock & Scott, PLLC is the law firm representing Freedom Mortgage and filed foreclosure after receiving discharge and trust documents via email.

III. FACTUAL BACKGROUND

7. Plaintiff lawfully submitted A4V presentments, trust documents, affidavits, and fee schedules to Freedom Mortgage and LoanDepot.
8. Freedom Mortgage and its attorney, Brock & Scott, received these materials before initiating foreclosure actions.
9. Despite proper notice, Defendants failed to respond or rebut, constituting dishonor and breach of fiduciary duty.

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10. Foreclosure was initiated by Brock & Scott on behalf of Freedom Mortgage after trust discharge, showing willful dishonor.

11. LoanDepot similarly ignored lawful presentments and continues to demand fiat payments in violation of trust law.

IV. CLAIMS FOR RELIEF

Count I – Violation of Due Process (42 USC §1983)

Count II – Dishonor of Commercial Instruments

Count III – Breach of Fiduciary Duty

Count IV – Fraudulent Foreclosure / Willful Dishonor

Count V – Declaratory Relief for Trust Enforcement

V. DAMAGES

12. Plaintiff seeks \$700,000 from Freedom Mortgage for dishonor and emotional, financial, and administrative injury.

13. Plaintiff seeks \$700,000 from Brock & Scott, PLLC for knowingly filing foreclosure after receiving full discharge and trust notice.

14. Plaintiff seeks \$500,000 from LoanDepot.com, LLC for dishonor and continued unlawful demands.

15. Plaintiff seeks punitive damages, costs, and injunctive relief from all Defendants.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- a. Award compensatory damages of \$1.9 million;
- b. Grant injunctive relief stopping foreclosure and requiring trust discharge recognition;
- c. Award punitive damages and legal fees;
- d. Enter declaratory judgment affirming trust authority and discharge;
- e. Grant any other relief the Court deems just and proper.

Respectfully submitted,

Miyuki Maureen Johnson, as Trustee of MMJ Foreign Express Trust and DK Johnson Estate Trust

Date: June 19, 2025

III-A. CONSTITUTIONAL VIOLATIONS

12. Defendants Freedom Mortgage and Brock & Scott, PLLC, acting jointly and with knowledge of the Plaintiff's lawful trust authority, proceeded to initiate foreclosure proceedings after receiving lawful discharge and fiduciary presentments.

13. Plaintiff was denied due process under the Fifth and Fourteenth Amendments, as her property interest—lawfully held in trust—was targeted without proper notice, hearing, or

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rebuttal.

14. Defendant Brock & Scott, PLLC, acting under color of law and in conspiracy with its client, knowingly deprived Plaintiff of the opportunity to assert and defend trust rights in a lawful proceeding.

15. Such conduct constitutes a violation of 42 U.S.C. §1983 (deprivation of rights under color of law) and may constitute conspiracy under 42 U.S.C. §1985.

Miyuki M. Johnson

Miyuki Johnson, Trustee
401 Mc Keltly Str. STE #345
Blythewood, SC 29016

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Notary Acknowledgment

State of South Carolina

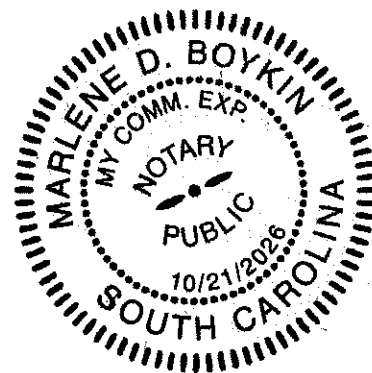
County of Richland

On this 22nd day of June, 2025, before me, the undersigned, a Notary Public in and for said State, personally appeared Miyuki Maureen Johnson, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

Marlene D. Boykin
Notary Public Signature

My Commission Expires: 10/21/2026



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